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Attorneys for Sonos, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GOOGLE LLC,
Plaintiff and Counterdefendant,
v.
SONOS, INC.,
Defendant and Counterclaimant.

Case No. 3:20-cv-06754-WHA
Related to Case No. 3:21-cv-07559-WHA

**DECLARATION OF COLE RICHTER IN
SUPPORT OF SONOS, INC.'S
OPPOSITION TO GOOGLE'S MOTION
TO STRIKE EXPERT REPORTS**

Date: March 9, 2023
Time: 8:00 a.m.
Place: Courtroom 12, 19th Floor
Judge: Hon. William Alsup

Complaint Filed: September 28, 2020

1 I, Cole Richter, declare as follows and would so testify under oath if called upon to do so:

2 1. I am an attorney with the law firm of Lee, Sullivan, Shea & Smith, LLP, counsel
3 of record to Sonos, Inc. (“Sonos”) in the above-captioned matter. I am a member in good
4 standing of the Bar of the State of Illinois. I make this declaration based on my personal
5 knowledge, unless otherwise noted. If called, I can and will testify competently to the matters set
6 forth herein.

7 2. I make this declaration in support of Sonos, Inc.’s Opposition To Google’s Motion
8 To Strike Expert Reports.

9 3. Attached as **Exhibit 1** is a true and correct copy of excerpts from the Opening
10 Expert Report of Douglas C. Schmidt dated November 30, 2022. This exhibit has been
11 highlighted for convenience.

12 4. Attached as **Exhibit 2** is a true and correct copy of excerpts from the Rebuttal
13 Expert Report of Douglas C. Schmidt dated January 13, 2023.

14 5. Attached as **Exhibit 3** is a true and correct copy of excerpts from the Reply Expert
15 Report of Douglas C. Schmidt dated January 23, 2023.

16 6. Attached as **Exhibit 4** is a true and correct copy of excerpts from the deposition
17 transcript of Douglas Schmidt taken on February 2, 2023. This exhibit has been highlighted for
18 convenience.

19 7. Attached as **Exhibit 5** is a true and correct copy of excerpts from Sonos’s Exhibit
20 B – Infringement Contention Chart: U.S. Patent No. 10,779,033. This exhibit has been
21 highlighted for convenience.

22 8. Attached as **Exhibit 6** is a true and correct copy of excerpts from Google LLC’s
23 Ninth Supplemental Objections and Responses to Plaintiff Sonos, Inc.’s First Set of Fact
24 Discovery Interrogatories (No. 12) dated November 29, 2022. This exhibit has been highlighted
25 for convenience.

26 9. Attached as **Exhibit 7** is a true and correct copy of excerpts from the Opening
27 Expert Report of Samrat Bhattacharjee Regarding Invalidity of U.S. Patent Nos. 10,779,033 and
28 9,967,615 and Other Issues. This exhibit has been highlighted for convenience.

